



They also provide confidential insight into Plaintiff's views regarding its insurance needs and specific exposures. Disclosure of the premium may also prejudice the ability of the Defendant, Chartis Specialty Insurance Company, to negotiate with competing policyholder customers in the marketplace. Finally, Plaintiff's redactions include the premium and limits of the primary insurance policy, and the primary insurance company, not even a party to this action, may similarly be prejudiced in negotiating premiums and limits with competing policyholder customers in the marketplace. For the foregoing reasons, the policy premiums and limits constitute proprietary and sensitive information. *C.f. SOHC, Inc. v. Zentis Sweet Ovations Holding LLC*, No. 14-CV-2270 JMF, 2014 WL 5643683, at \*5 (S.D.N.Y. Nov. 4, 2014) (permitting redactions where "limited to specific 'financial figures and customer information' . . . which are not relevant to the parties' legal dispute and implicate legitimate privacy interests"); *In re Millennial Media, Inc. Sec. Litig.*, No. 14 CIV. 7923 PAE, 2015 WL 3443918, at \*5 (S.D.N.Y. May 29, 2015) (allowing redactions of "pricing, budget, and financial figures" from filings, noting, "[t]he redacted data is irrelevant to any issue in this case and appears to be confidential").

In full appreciation for the presumption of public access to judicial documents, Plaintiff annexed these full insurance policies to its Complaint. However, in the exercise of caution as directed by Rule 21.4, Plaintiff redacted only the policy premium and limit amounts, which are not in dispute. Upon assignment of this case to YourOrr Honor, Plaintiff promptly complied with Rule 4(A)(i) of the Court's Individual Rules, by providing an unredacted copy of the documents that highlight the information redacted.


Based on the foregoing, and pursuant to this Court's Order, Plaintiff now respectfully applies to the Court for leave to file the insurance policies with redactions in full compliance with the Court's Individual Rule 4(A)(ii) and ECF Rule 21.4, as previously filed.

Pursuant to the Order, Plaintiffs have served a copy of the Order on Defendant, but because no counsel for Defendant has yet appeared in this action as of the date of this application, Defendant's consent has not yet been obtained.

Dated: April 27, 2018

Respectfully submitted,

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